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RECEIVED

May 18, 2016

Via Messenger

Ms. Luly Massaro Division Clerk Division of Public Utilities and Carriers 89 Jefferson Boulevard Warwick, RI 02888

Re: Invenergy, PUC Advisory Opinion, Docket No. 4609

Dear Luly:

On behalf of Invenergy, enclosed please find an original and 7 copies of Invenergy Thermal Development LLC's Responses to the Conversation Law Foundation's 4th Set of Data Requests in connection with the above docket.

Please let me know if you have any questions.

Very truly yours,

ALAN M. SHOER ashoer@apslaw.com

Enclosures

cc: Service List (via e-mail)

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS PUBIC UTILITIES COMMISSION

IN RE: INVENERGY THERMAL DEVELOPMENT

LLC'S PROPOSAL FOR CLEAR RIVER ENERGY

CENTER

DOCKET NO. 4609

INVENERGY THERMAL DEVELOPMENT LLC'S RESPONSES TO THE CONSERVATION LAW FOUNDATION'S 4th SET OF DATA REQUESTS

REQUEST 4.1:

This Data Request refers to the second page of the spread sheet that Invenergy provided on January 28, 2016, in response to CLF Data Request 1-3, entitled "Rhode island Energy Cost Savings from Clear River."

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- (a) Invenergy showed its project for capacity savings to Rhode Island ratepayers by calendar years. Please provide the same information for each of: Capacity Commitment Period 10 (June 1, 2019 to May 31, 2020); CCP-11 (June 1, 2020 to May 31, 2021); and CCP-12 (June 1, 2021 to May 31, 2022). (Note: CLF believes that this Data Request does not ask Invenergy to create a document that does not already exist, as this information appears to have been provided by CCP in Invenergy's January 12 EFSB presentation, Slide 24).
- (b) There is a column on this spread sheet entitled "ISO-NE Cleared Capacity." Please state whether these figures are (or are not) net of 975 MW of HQICC.
- RESPONSE 4.1 (a) Please see '02c Clear River Capacity Cost to Load_Demonstrative Pre FCA 10 by DY.xlsx', attached as Exhibit 1.
- RESPONSE 4.1 (b) The cleared capacity values are *not* net of HQICC.

RESPONDENT: Mark Repsher, PA Consulting, Inc.

DATE: May 18, 2016

INVENERGY THERMAL DEVELOPMENT LLC By its Attorneys,

/s/Alan M. Shoer

Alan M. Shoer, Esq. (#3248)
Richard R. Beretta, Jr. Esq. (#4313)
Nicole M. Verdi, Esq. (#9370)
ADLER POLLOCK & SHEEHAN, P.C.
One Citizens Plaza, 8th Floor
Providence, RI 02903-1345

Tel: 401-274-7200 Fax: 401-751-0604 Dated: May 18, 2016

CERTIFICATE OF SERVICE

I hereby certify that on May 18, 2016, I delivered a true copy of the foregoing responses to Conservation Law Foundation's Data Requests via electronic mail to the parties on the attached service list.

/s/ Alan M. Shoer

EXHIBIT 1

Rhode Island Capacity Cost Savings from Clear River

nominal \$

							Capacity Cost	Savings to	Ratepayer	(\$/year)	peak demand with	reserve margin *	ROP capacity price	differential		\$119,242,881	\$80,985,710	\$22,099,056
						FCA Rest Of Pool	(ROP) Capacity	Compensation	Differential	(\$/kW-mo)	ROP calendar	year-adjusted	capacity price	"Without CREC"		\$4.39	\$3.01	\$0.83
Demand Figures (MW) ¹	RI Peak	Demand	(MM),	With	Reserve	Margin	Proportion	ate to ISO	Reserve	Margin						2,262	2,239	2,225
								ISO-NE	Peak	Load						30,230	30,575	30,900
								ISO-NE	Cleared	Capacity						36,789	36,877	36,948
									RI Peak	Demand						1,859	1,856	1,861
															Year	2019/20	2020/21	2021/22

¹ Source: Rhode Island and ISO-NE peak demand (MW) figures sourced from ISO-NE's 2015 Capacity, Energy, Loads, and Transmission Report (CELT Report)